

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS-EASTERN DIVISION**

LP A/S,

Plaintiff,

v.

THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED IN SCHEDULE “A”,

Defendants.

No. 24-cv-4260

**PLAINTIFF’S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Plaintiff LP A/S, (“Plaintiff”) requests leave to file the following attached documents under seal: (1) Plaintiff’s Complaint; (2) Schedule “A” attached to the Complaint, which lists the Defendant Internet Stores; (3) Exhibit 1 to the Complaint, Plaintiff’s federal trademark and trade dress registrations; (4) Plaintiff’s Motion and Brief in Support of Plaintiff’s *Ex Parte* Request for an Emergency Temporary Restraining Order, which includes alleged facts of the Complaint and Plaintiff’s reasoning for seeking such an order, (5) the Declaration of Plaintiff in support of the motion, and (6) Exhibits 1 and 2 to the Declaration containing Plaintiff’s trademark and trade dress registration certificates and evidence referenced in the Declaration. In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for trademark infringement and counterfeiting, false designation of origin, copyright infringement, and violation of the Illinois Uniform Deceptive Trade Practices Act, and civil conspiracy.

Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant

documentary evidence and the concealment or transfer of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

Dated: May 23, 2024

Respectfully submitted,

/s/James E. Judge

Zareefa B. Flener (IL Bar No. 6281397)

James E. Judge (IL Bar No. 6243206)

Ying Chen (IL Bar No. 6346961)

Flener IP Law, LLC

77 W. Washington St., Suite 800

Chicago IL 60602

(312) 724-8874

[jjudge@fleneriplaw.com](mailto:jjudge@fleneriplaw.com)